

Message

From: Kappelman, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AB505B2FB021469A954A5C082F7E77C3-KAPPELMAN, DAVID]
Sent: 5/10/2016 2:39:59 PM
To: Compton, Harry [Compton.Harry@epa.gov]
Subject: RE: R9 Hunters Point Naval

I forgot to mention that we did discuss funding somewhat and I told them that additional different funding other than Superfund would need to be located for any onsite ERT support. I forgot to put that in the last email to you.

From: Compton, Harry
Sent: Tuesday, May 10, 2016 10:34 AM
To: Kappelman, David <Kappelman.David@epa.gov>
Subject: RE: R9 Hunters Point Naval

Good information, and yes let's talk later or tomorrow.

From: Kappelman, David
Sent: Tuesday, May 10, 2016 10:30 AM
To: Compton, Harry <Compton.Harry@epa.gov>
Subject: R9 Hunters Point Naval

The call went well. Lyndsey and I were both on the call. They wanted some clarification on some of my comments. I did suggest that EPA find out from the Navy what their "Direct Supervision" was onsite of the Navy contractors performing the work since the identified falsification of sampling locations. I did mention that ERT would be willing to support the Region and the RPMs, but that funding would be needed if they wanted us to perform an onsite inspection of the contractor, or go to any meetings with the Navy. I did mention that ERT could provide onsite supervision during the Final Status Survey sampling events and arrange for split sampling and analyses for comparison with the Navy contractors. I also told them that any Final Status Survey analyses for Th-232 (alpha emitter) should be analyzed by alpha spectrometry and compared with any gamma spectroscopy "surrogate" inference concentrations using Ac-228.

The ROD is from 2006 and has clean up goals that were calculated then. I will be talking with Dana Stalcup later today regarding the Westlake Landfill Site (St. Louis, Mo). I will ask if the Remedy Review Board has ever reviewed the ROD since 2006.

RPM (Lily Lee) was going to talk with her supervisor to see if R9 wanted any onsite assistance.

I can give you a call later to discuss if you wish. Attached is an email I sent them last week after I reviewed the documentation that she sent me.

Dave Kappelman

-----Original Message-----

From: Kappelman, David
Sent: Thursday, May 05, 2016 2:14 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Terry, Robert <Terry.Robert@epa.gov>
Subject: RE: Potential questions for Navy re Tetra Tech

Tetra Tech indicated in their letters to NRC that they did resampling of areas where the personnel who committed the false data reporting had previously sampled. Since the Navy is the one who identified the low K-40 sample results in

soil, they may be looking at all of the data for consisting between NORM radionuclides as well as the Radio-nuclides of Concern (ROC). Cs-137, Ra-226, Th-232, and Sr/Y -90

Ac-228 can be appropriately used as a surrogate radionuclide to infer Th-232 concentrations assuming or after proof the Ra-228 is in secular equilibrium with Th-232. It appears that this is just an assumption based on when HPNS ceased operational use with Th-232. Alpha spec results of Th-232 and gamma spec results of Ac-228 and daughter products could confirm this. This may already have been done previously, but I did not see it in the report.

The report indicates that TI-208 would be used to infer Th-232 concentrations by gamma spectroscopy if there was a qualifier "flag" on the Ac-228 activity. Based on the decay scheme. TI-208 activity concentration would only be about 1/3 of the Ac-228 activity. Any inference of Th-232 activity utilizing TI-208 would need to be multiplied by 3 for comparison with PRG goals for Th-232 .

Ra-226 reported activity by the onsite lab was elevated high from the Onsite Laboratory compared to Offsite Laboratory results beyond the 2sigma error bars. (i.e. SU 115 report Table 4-1 page 4-2). The onsite laboratory analyzed each sample for 45 minutes. There was good agreement between the onsite and offsite laboratory for Pb-214 and Bi-214 which are Ra-226 decay progeny.

In order to restore confidence in current operations and to reassure the public you may want to consider the following:

EPA/State split sampling of the Final Status Survey (FSS) samples for analyses comparison of contractor provided results.

A third party or EPA could perform a 100% scan of exposed trenches following the soil sampling Final Status Survey (FSS) lab results and take high biased samples and send to Test America - St. Louis or the National Air & Radiation Laboratory in Montgomery, AL for QA analysis of high biased sampling locations. This could be independent from what the contractor or the Navy is doing.

100% Surface Scan survey of all released Survey Units capped/covered or not. The EPA has access to better gamma scanning instrumentation and mapping capabilities than was previously utilized on HPNS.

David Kappelman
USEPA Environmental Response Team
513-240- 6840

-----Original Message-----

From: LEE, LILY

Sent: Thursday, May 05, 2016 11:21 AM

To: Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Terry, Robert <Terry.Robert@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>

Subject: Fwd: Potential questions for Navy re Tetra Tech

I have drafted the attached list of questions for the Navy. Would you recommend additions/changes?

This list can include topics we want the Navy to be prepared to present to public to help explain the levels of risk and uncertainties.